

NO. 16-4183

In The
United States Court of Appeals
For The Fourth Circuit

United States of America,

Appellee,

v.

Makeshia Lashon Glover,

Appellant

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

**APPELLANT'S MOTION TO EXCEED JOINT APPENDIX PAGE
LIMITATIONS**

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Attorney for the Appellant

THIS MATTER comes before the Court by way of an appeal from convictions of five co-defendants following a lengthy joint trial. The Appellants intend to raise three issues on appeal: (1) whether the District Court erred in refusing to permit the Appellants to proceed *pro se* at trial; (2) whether the District Court erred in denying two Appellants'¹ motions for judgments of acquittal; and (3) whether the District Court erred in calculating Appellant Makeshia Lashon Glover's base offense level pursuant to U.S.S.G. § 2B1.1. These issues, therefore, require the Appellants to present numerous filings and transcripts from pretrial and post-trial matters, and also necessarily require the inclusion of the trial transcript in its entirety in the Joint Appendix. The trial transcript alone is 1,452 pages in total length. As a result of the inclusion of all of these documents, the Joint Appendix is 2,105 pages in total length. The parties have agreed with the contents of the Joint Appendix in accordance with Rule 30(b)(1), FRAP.

Additionally, all five Appellants are currently being represented by appointed counsel. Pursuant to Local Rule 32(a), FRAP, "[n]o joint appendix in a court-appointed case should exceed 500 pages without advance permission from the Court; unless such permission is granted, reimbursement of copy expenses will be limited to 500 pages." As discussed above, the Appellants could not adequately present their

¹ These Appellants are Linda Marie Henry a/k/a Malak Bey and Jefford Henry, Jr., a/k/a Malik Bey.

issues within the 500-page limit set forth in Local Rule 32(a). Accordingly, the Appellant respectfully requests that this Court permit her to file a Joint Appendix in excess of the 500-page limit, and to obtain reimbursement of copy expenses for the full 2,105 pages of the Joint Appendix.

WHEREFORE, having set forth her grounds, the Appellant respectfully requests that this Court permit her to file the Joint Appendix in excess of 500 pages, and to obtain reimbursement of copy expenses for the full 2,105 pages of the Joint Appendix.

Respectfully submitted,

s/ Jeremy A. Thompson

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This 4th day of August, 2016.

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CERTIFICATE OF SERVICE

I, Jeremy A. Thompson, hereby certify that on August 4, 2016, a copy of this Appellant's Motion for Extension of Time was served on the Appellee through the CM/ECF system.

s/ Jeremy A. Thompson

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